

# EXHIBIT A

## DEFAULT JUDGMENT MOTION COVER SHEET

**MDL MOVING PAPERS**

Motion: ECF No. \_\_\_\_\_

Memorandum of law: ECF No. \_\_\_\_\_

Declaration & supporting exhibits: ECF No. \_\_\_\_\_

**PLAINTIFFS**

Please describe each set of plaintiffs requesting judgments in this motion.

<b>Exhibit</b>	<b>Description of Plaintiffs</b>	<b>Cause(s) of Action</b>

**DEFENDANTS**

Please list all defendants the plaintiffs are moving against:

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**COMPLIANCE**

As stated in ECF No. \_\_\_\_\_ at ¶\_\_\_\_\_, counsel followed the quality control measures outlined in ECF No. 3433 and adopted in ECF No. 3435.

As stated in ECF No. \_\_\_\_\_ at ¶\_\_\_\_\_, these plaintiffs have not previously received judgments against these defendants.

Excel versions of any tables attached to the proposed order were emailed to  
[Netburn\\_NYSDChambers@nysd.uscourts.gov](mailto:Netburn_NYSDChambers@nysd.uscourts.gov) on \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_. see Liability Judgment on page 2

**SUBJECT MATTER JURISDICTION**

The Court previously addressed subject matter jurisdiction over these claims in ECF No. \_\_\_\_\_. see Liability Judgment on page 2

The Court has not previously addressed subject matter jurisdiction over these claims. see Liability Judgment on page 2

**PERSONAL JURISDICTION**

The Court previously addressed personal jurisdiction over these defendants in ECF No. \_\_\_\_\_. see Liability Judgment on page 2

The Court has not addressed personal jurisdiction over these defendants.

**FACTUAL & LEGAL QUESTIONS**

This motion requests  new functional equivalence findings;  new personal injury assessments; or  resolution of a new issue: \_\_\_\_\_

This motion does not raise novel factual or legal issues.

## **RELEVANT FILINGS**

For each member case, list docket entries for the corresponding filings. Duplicate this page if additional space is needed.